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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RONALD KEEN, ET AL.,

Plaintiffs,

vs.

OMNI LIMOUSINE,

Defendant.

CASE NO.: 2:16-cv-01903-JCM-GWF

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINES TO
RESPOND TO MOTION TO LIFT STAY
(ECF No. 27) and MOTION FOR
BRIEFING SCHEDULE RE MOTION
FOR CIRCULATION OF NOTICE (ECF
No. 28)**

(First Request)

Plaintiffs, by and through their counsel of record, Thierman Buck, LLP, and Defendant, by and through its counsel of record, the Garg Golden Law Firm, hereby stipulate and agree as follows:

1. To an extension of Defendant's deadline to respond to Plaintiffs' Motion to Lift Stay (ECF No. 27) from April 7, 2017, to April 21, 2017; and
2. To an extension of Defendant's deadline to respond to Plaintiffs' Motion for Briefing Schedule re Motion for Circulation of Notice (ECF No. 28) from April 7, 2017, to April 21, 2017.

On March 30, 2017, Plaintiffs filed their Motion to Lift Stay (ECF No. 27) and Motion for Briefing Schedule re Motion for Circulation of Notice (ECF No. 28). On March 31, 2017, the

1 Court ordered Defendant to file any opposition to the foregoing motions no later than April 7, 2017
2 (ECF. No. 30). Since the Court's Order, the parties have engaged in good faith discussions, through
3 their counsel, to submit this case and the related case, *McSwiggin v. Omni Limousine*, Case No
4 2:14-cv-02172-JCM-NJK, to mediation. Accordingly, the parties wish to dedicate time and
5 financial resources toward that end. The parties anticipate reaching an agreement on submitting
6 the cases to mediation within 14 days of today and, therefore, request that the Court extend
7 Defendant's opposition deadline on the respective motions 14 days from today to April 21, 2017.
8 Provided the parties reach an agreement regarding mediation in that time, they will submit to the
9 Court a further stipulation regarding the stay.

10 This stipulation is not made for the purposes of delay but to allow the parties sufficient
11 time to reach an agreement on a mediator and to initiate the mediation process. This is the first
12 request for an extension of these deadlines.

13 DATED this 7th day of April, 2017.

DATED this 7th day of April, 2017

14 GARG GOLDEN LAW FIRM

THIERMAN BUCK, LLP

15 By /s/ Anthony B. Golden
16 Anthony B. Golden, Esq.
17 Margaret G. Foley, Esq.
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15 By /s/ Joshua D. Buck
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18 *Counsel for Defendant*

Counsel for Plaintiffs

21 **ORDER**

22 IT IS SO ORDERED:

24 
25 UNITED STATES MAGISTRATE JUDGE

27 DATED: April 10, 2017